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ATTORNEYS FOR DEFENDANT

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARIAH MORRIS,

Plaintiff,

v.

BUCKINGHAM PLACE SNF, LLC

Defendant.

**CIVIL ACTION NO.: 19-CV-02726-JS**

**NOTICE OF DEFENDANT'S PARTIAL MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT AND EXTEND THE TIME TO ANSWER  
PLAINTIFF'S TITLE VII RETALIATION CLAIM**

Defendant Buckingham Place SNF, LLC ("Defendant"), respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), for entry of an order dismissing Plaintiff's claims against Defendant. The law supporting this motion is fully set forth in the accompanying Memorandum of Law.

A proposed order is also submitted herewith.

Respectfully submitted,  
**JACKSON LEWIS P.C.**

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DATED: September 23, 2019

4820-1154-4487, v. 1